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[Additional counsel on signature page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

FREE RANGE CONTENT, INC., a  
California corporation, COCONUT ISLAND  
SOFTWARE, INC., a Hawaii corporation,  
TAYLOR CHOSE, a Minnesota resident, and  
MATTHEW SIMPSON, a British Columbia,  
Canada resident, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:14-cv-02329-BLF

**JOINT STIPULATED REQUEST AND**  
**~~PROPOSED~~ ORDER TO CONTINUE**  
**DEADLINES FOR PRELIMINARY APPROVAL**  
**OF SETTLEMENT**  
**AS MODIFIED BY THE COURT**

Courtroom: 3  
Judge: Hon. Beth Labson Freeman  
Trial Date: Vacated

1 This stipulation is entered into by and between Free Range Content, Inc., Coconut Island  
2 Software, Inc., Taylor Chose, and Matthew Simpson (“Plaintiffs”) and Google LLC (“Google”)  
3 (collectively, “the Parties”), by and through their respective counsel:

4 WHEREAS, this Court issued an order (“Order”) requesting a status update regarding the  
5 Parties’ progress toward reaching settlement on December 18, 2017 (Dkt. No. 235);

6 WHEREAS, in response to this Court’s Order, the Parties filed a Joint Response to  
7 Request for Status Update and Agreed Request and [Proposed] Order re: Motion for Preliminary  
8 Approval on January 8, 2018 (Dkt. No. 238), laying out the following proposed preliminary  
9 approval schedule:

| Event                           | Date  |
|---------------------------------|---|
| Motion for Preliminary Approval | February 15, 2018   |
| Response, if any                | March 5, 2018   |
| Reply, if any                   | March 12, 2018  |
| Hearing, if any                 | March 22, 2018 at 9:00 a.m. (or as<br>otherwise set by the Court) |

14  
15 WHEREAS, this Court issued an order accepting the above proposed preliminary  
16 approval schedule, with the exception of the hearing date, which the Court set for April 5, 2018  
17 (Dkt. No. 239);

18 WHEREAS, the Court has previously granted requests for scheduling extensions and  
19 modifications as detailed in ¶ 8 of the accompanying Declaration of Jeffrey M. Gutkin (“Gutkin  
20 Decl.”), and the Parties have neither stipulated to nor moved for any additional modifications of  
21 time (Gutkin Decl. ¶ 8);

22 WHEREAS, Civil Local Rule 6-2(a) permits parties to file a stipulation requesting an  
23 order changing time that affects the date of an event or deadline set by Court order;

24 WHEREAS, on the April 5, 2018 date for which this Court set the hearing on Plaintiffs’  
25 Motion for Preliminary Approval, Google’s lead counsel Michael Rhodes is scheduled to be in  
26 trial before the Honorable Edward J. Davila (trial currently set to conclude on May 8) and Jeffrey  
27 Gutkin is scheduled to be outside of the continental United States (Gutkin Decl. ¶ 3);

28 WHEREAS, Plaintiffs’ counsel informed Google’s counsel that they have scheduling

conflicts that would preclude them from attending a hearing on Plaintiffs' Motion for Preliminary Approval on the following Thursday, April 12, 2018 (Gutkin Decl. ¶ 4);

WHEREAS, in order to ensure that one of Google's lead counsel and Plaintiffs' counsel will be able to attend the hearing on Plaintiffs' Motion for Preliminary Approval, the Parties have conferred and agreed to request a brief continuance, until April 19, 2018, or whatever date thereafter is convenient for the Court (Gutkin Decl. ¶ 5);

WHEREAS, in light of the requested brief continuance of the hearing date, Plaintiffs have also determined they would be aided by an additional week to prepare their Motion for Preliminary Approval, and Google has no objection to Plaintiffs' request for additional time (Gutkin Decl. ¶ 6);

NOW THEREFORE, pursuant to Civil Local Rule 6-2(a), Google and Plaintiffs jointly make the stipulated request that the Court enter an order modifying the schedule for preliminary approval as follows:

| Event                           | Date  |
|---------------------------------|---|
| Motion for Preliminary Approval | February 22, 2018   |
| Response, if any                | March 12, 2018  |
| Reply, if any                   | March 19, 2018  |
| Hearing, if any                 | April 19, 2018 at 9:00 a.m. (or<br>whatever date thereafter is convenient<br>for the Court) |

**IT IS SO STIPULATED.**

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1 Dated: January 22, 2018

COOLEY LLP  
MICHAEL G. RHODES (116127)  
JEFFREY M. GUTKIN (216083)  
KYLE C. WONG (224021)

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4  
5 /s/ Jeffrey M. Gutkin

Jeffrey M. Gutkin  
Attorneys for Defendant  
GOOGLE LLC

6  
7  
8 Dated: January 22, 2018

HAGENS BERMAN SOBOL SHAPIRO LLP  
STEVE W. BERMAN (*pro hac vice*)  
ROBERT F. LOPEZ (*pro hac vice*)

9  
10  
11 /s/ Robert F. Lopez

Robert F. Lopez  
Attorneys for Plaintiffs

12  
13 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

14  
15 Dated: January 25, 2018

  
THE HONORABLE BETH LABSON FREEMAN  
UNITED STATES DISTRICT JUDGE

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18 The Court hereby RESETS the hearing on the motion for preliminary approval to  
19 April 27, 2018 at 9:00 A.M.  
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